



**Learning Disabilities Association of Ontario Response to Consultation on the
Draft PPM 81, *Provision of health support services in school settings***

February 2022

The Learning Disabilities Association of Ontario (LDAO) and its community-based chapters represent the interests of persons with learning disabilities (LDs) throughout Ontario. LDAO welcomes the opportunity to comment on the revised draft PPM 81, ***Provision of health support services in school settings***, as students with learning disabilities may require speech and language, occupational therapy and/or physiotherapy services in school settings.

LDAO supports the need to coordinate services provided through Children’s Treatment Centres (CTCs) and school boards, but it is our strong belief that monitoring the delivery of rehabilitation services in school settings should be the primary responsibility of schools. The school principal is responsible for students’ Individual Education Plans, so rehabilitation service providers from any organization should be accountable to the principal for aligning their services with the goals and expectations on IEPs.

Principals should also be responsible for ensuring that anyone providing health support services in the school has had a vulnerable sector police check.

LDAO strongly supports the practice of a single speech and language therapist providing both speech and language therapy to a student. This will require that all speech-language pathologists who work in schools have training and experience with both speech therapy and language therapy, while acknowledging that there may be some specialized services that require particular expertise.

LDAO supports the importance of training for all service providers, including paraprofessionals and parents working under the direction of a health professional. Ideally it would be best for all services to be delivered by regulated health professionals, but resource constraints may limit this. Regulated health professionals should be involved in training any service providers in the school, and the training should include specific guidelines for an individual student, with input from families.

LDAO supports a multidisciplinary team approach to provision of health support services. Students may be working with different types of health professionals and there need to be mechanisms for communication among all service providers and with families.

LDAO strongly supports the involvement of families (parents/caregivers) in all stages of school health support services. In addition to the places where families are mentioned in the draft PPM, we recommend the following:

- “A process for referrals that allows either the parent(s)/caregiver(s) or principal to request service.”

The process must be easily available to families in accessible formats, plain language and translations, e.g. on the school board website.

- “A description of the range of service interventions offered (e.g. universal/consultative services, small group therapy, 1:1 therapy) and where those services may be delivered, including which may be offered in the classroom setting.”

The description must be easily available to families in accessible formats, plain language and translations, e.g. on the school board website.

- “A process for scheduling, taking into consideration space availability, provider schedules, and student educational programming”

Considerations in scheduling should include family circumstances.

- “A process and protocols for information sharing and expectations among parent(s)/caregiver(s), providers, and educators.”

Families need to be included in development of clinical service plans, and provide input to training of service providers to work with their child.

In addition:

Development of service protocols should be adaptable to including new and emerging evidence-based interventions.

School board implementation plans for PPM 81 need to include consultation with SEACs and with families.

Finally:

There needs to be specific mention of the requirement that any provisions align with the Ontario Human Rights Code (OHRC) and current regulations under the Accessibility for Ontarians with Disabilities Act (AODA).